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*Attorneys for Federal Defendants*

**UNITED STATES DISTRICT COURT  
 DISTRICT OF NEVADA**

CANA FOUNDATION, a non-profit  
 corporation, LAURA LEIGH, individually, and  
 WILD HORSE EDUCATION, a nonprofit  
 corporation,

*Plaintiffs,*

v.

UNITED STATES DEPARTMENT OF THE  
 INTERIOR, BUREAU OF LAND  
 MANAGEMENT, and JON RABY, Nevada  
 State Director of the Bureau of Land  
 Management,

*Federal Defendants.*

Case No. 2:22-cv-01200-CDS-BNW

**CONSENT MOTION TO EXTEND  
 SETTLEMENT CONFERENCE  
 DEADLINES [ECF NO. 80]**

On September 25, 2024, the Court entered an Order Scheduling Settlement Conference, which scheduled a settlement conference for October 30, 2024, at 10:00 a.m. via Zoom, a pre-Settlement Conference telephonic conference for October 29, at 3:00 p.m., and a deadline of October 23, by 4:00 p.m. for the parties to submit their Confidential Written Evaluation Statements. ECF No. 80.

Due to prior competing litigation obligations, Federal Defendants seek to reschedule the Settlement Conference and related deadlines. Federal Defendants have conferred with Plaintiffs

1 to identify mutual availability between the parties and their counsel. Based on those  
2 conversations, Federal Defendants respectfully request that the Court reschedule the Settlement  
3 Conference deadlines as follows:

- 4 • Settlement Conference: November 6 or 7, 2024 (dependent on United States  
5 Magistrate Judge Brenda Weksler's availability)
- 6 • Pre-Settlement Conference Telephonic Conference: One day prior to the Settlement  
7 Conference
- 8 • Confidential Written Evaluation Statements: Seven days prior to the Settlement  
9 Conference

10  
11 Federal Defendants have conferred with Plaintiffs and Plaintiffs consent to this requested  
12 relief.  
13

14  
15 Dated: October 10, 2024

Respectfully Submitted,

16 TODD KIM, Assistant Attorney General  
17 United States Department of Justice  
18 Environment and Natural Resources Division

19 /s/ Michelle M. Spatz

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on October 10, 2024, I filed the foregoing Consent Motion to Extend Settlement Conference Deadlines electronically through the CM/ECF system, which caused all parties or counsel of record to be served by electronic means, as more fully reflected on the Notice of Electronic Filing.

/s/ Michelle M. Spatz  
Michelle M. Spatz  
U.S. Department of Justice